

Message

From: Dean Peschel [dean_peschel@yahoo.com]
Sent: 7/13/2018 8:13:57 PM
To: Dunn, Alexandra [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=426d0177eaab4001a5c85f051565997e-Dunn, Alexa]
Subject: Berry Brook Watershed Restoration Site visit
Attachments: Municipal Coalition Adaptive Management Plan-final 10-27-11.pdf; EPA 10-9-15 (1) (1).pdf

Dear Alex,

Thank you for visiting Dover yesterday to tour the Berry Brook Watershed restoration project. Your enthusiasm, praise and support was deeply appreciated by the City staff and UNH Stormwater Center. It was written all over their faces.

For me your commentary on the permitting process and hesitancy of staff to make a decision that could be determined as not stringent enough down the road for non criticals like nutrients which are very different from toxic contaminants was a breeze of fresh air. Making incremental improvements and monitoring the effects is what Adaptive management is about. As John Storer so aptly stated "after you make a \$20 million upgrade you can't undo it". In 2011 when the first draft permit came out for the Exeter WWTP with TN limits of 3 mg/l, the Great Baay Municipal Coalition committed to implement and Adaptive Management approach. The GBMC presented that commitment at a meeting where many stakeholders from NHDES, PREP, EPA UNH researchers and others were in attendance. That presentation was met by skepticism and lack of trust from EPA, PREP and activists. What you witnessed yesterday were the results of a part of that commitment by the City of Dover. Dover also has planned, designed and constructed the upgrade at the Dover WWTP to remove nitrogen. Rochester has done the same voluntarily optimizing their plant to remove nitrogen as part of that commitment. In addition Dover and the GBMC communities have invested significantly each field season to expand the system monitoring in support of the NHDES/ PREP annual work. The Coalition funded the development of a calibrated 3 dimensional hydrodynamic model by HDR / Hydroqual that shows the high flushing rates and short detention times in the Great Bay estuary which largely gets ignored because it doesn't support the views who believe nitrogen has to be the cause of eelgrass loss. I am attaching two presentations for you to look at. On is where the GBMC commits to adaptive management approach back in October 2011. The second is a presentation made to the former Region 1 Administrator Spalding , Ken Moraff and others in October 2015 regarding accomplishments Dover had implemented toward adaptive management between 2011 and 2014. Mike Joyal, the Dover City Manager, was not just talking the talk yesterday, when he says Dover cares about being a good steward of the estuary. Dover has walked the talk and we appreciate the acknowledgement of those efforts by EPA and deserve the trust to work cooperatively to do what is necessary based on the current state of our understanding.

Again thank you for your attentiveness and support yesterday. Your leadership, experience, and practical approach is exactly what EPA needs.

Best Regards,

Dean Peschel

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